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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

KELLY CAHILL, et al., individually and
on behalf of others similarly situated,

Plaintiffs,

vs.

NIKE, INC., an Oregon Corporation,
Defendant.

Case No. 3:18-cv-01477-JR

**DECLARATION OF MENGFEI SUN IN
SUPPORT OF PLAINTIFFS' MOTION
FOR CLASS CERTIFICATION**

FILED WITH REDACTIONS

DECL. OF MENGFEI SUN ISO PLS' MOT. FOR CLASS CERTIFICATION

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I, Mengfei Sun, declare as follows:

1. I am a member in good standing of the Bar of the State of California and an associate at the law firm of Goldstein Borgen Dardarian & Ho in Oakland, California. I was admitted *pro hac vice* to this Court for this action on January 10, 2020. I am counsel for Plaintiffs, Opt-in Plaintiffs, and the putative class members, along with Markowitz Herbold, Ackerman & Tilajef, and India Lin Bodien Law. I am providing this declaration in support of Plaintiffs' Motion for Class Certification. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to them if called upon to do so.

2. Attached hereto as Exhibit 1 is a true and correct copy of "Nike VALUES Band Overview" (NIKE_00000026-33), produced by Nike in this litigation, and entered as deposition exhibit 505 at the deposition of Shane Walker, December 17, 2020. Based on the metadata associated with this document, produced by Nike, this document was created and last modified on January 29, 2013.

3. Attached hereto as Exhibit 2 is a true and correct copy of "Total Rewards Deep-Dive, Rewards Conversations," dated 2018 (NIKE_00001653-706), produced by Nike in this litigation, and entered as deposition exhibit 538 at the deposition of Shane Walker, December 18, 2020. Based on the metadata associated with this document, produced by Nike, this document was created and last modified on June 29, 2018.

4. Attached hereto as Exhibit 3 is a true and correct copy of "Workforce Planning, Tool and Process Training" (NIKE_00001853-70), produced by Nike in this litigation, and entered as deposition exhibit 643 at the deposition of Treasure Heinle, March 16, 2021. Based on the metadata associated with this document, produced by Nike, this document was created and last modified on March 10, 2018.

5. Attached hereto as Exhibit 4 is a true and correct copy of the final draft of a speech by Mark Parker (NIKE_00001960-79), produced by Nike in this litigation, and entered as deposition exhibit 561 at the deposition of Shane Walker, December 21, 2020. Based on the metadata associated with this document, produced by Nike, this document was created on and last modified on May 3, 2018.

6. Attached hereto as Exhibit 5 is a true and correct copy of “FY16-17 Sustainable Business Report” (NIKE_00001996-2069), produced by Nike in this litigation, and entered as deposition exhibit 509 at the deposition of Shane Walker, December 17, 2020.

7. Attached hereto as Exhibit 6 is a true and correct copy of “TA Comp History Policy” (NIKE_00002070-71), produced by Nike in this litigation, and entered as deposition exhibit 513 at the deposition of Shane Walker, December 17, 2020. Based on the metadata associated with this document, produced by Nike, this document was created and last modified on August 24, 2017. Plaintiffs attempted to make this document text searchable, but were unable to do so due to the poor image quality of the original document.

8. Attached hereto as Exhibit 7 is a true and correct copy of an email from Monique Matheson, regarding “Representative & Pay Equity Commitments,” sent April 4, 2018 (NIKE_00002233-36), produced by Nike in this litigation, and entered as deposition exhibit 512 at the deposition of Shane Walker, December 17, 2020. Based on the metadata associated with this document, produced by Nike, this document was created and last modified on April 4, 2018.

9. Attached hereto as Exhibit 8 is a true and correct copy of an email from Mark Parker regarding “A note from Mark,” sent March 15, 2018 (NIKE_00002237-38), produced by Nike in this litigation, and entered as deposition exhibit 560 at the deposition of Shane Walker, December 21, 2020.

10. Attached hereto as Exhibit 9 is a true and correct copy of “Assessing Performance Summary,” dated December 22, 2015 (NIKE_00002301), produced by Nike in this litigation, and entered as deposition exhibit 638 at the deposition of Treasure Heinle, March 16, 2021. Based on the metadata associated with this document, produced by Nike, this document was last modified on March 22, 2019.

11. Attached hereto as Exhibit 10 is a true and correct copy of “Bands and Levels” (NIKE_00002303), produced by Nike in this litigation, and entered as deposition exhibit 504 at the deposition of Shane Walker, December 17, 2020. Based on the metadata associated with this document, produced by Nike, this document was last modified on March 22, 2019.

12. Attached hereto as Exhibit 11 is a true and correct copy of “Hiring Process,” dated December 13, 2018 (NIKE_00003185), produced by Nike in this litigation, and entered as deposition exhibit 663 at the deposition of Shine Thomas, March 26, 2021. Based on the metadata associated with this document, produced by Nike, this document was last modified on July 1, 2019.

13. Attached hereto as Exhibit 12 is a true and correct copy of “2019 Manager Training Program” (NIKE_00003191), produced by Nike in this litigation, and entered as deposition exhibit 500 at the deposition of Shane Walker, December 17, 2020. Based on the metadata associated with this document, produced by Nike, this document was created on March 4, 2019 and last modified on May 12, 2019.

14. Attached hereto as Exhibit 13 is a true and correct copy of “Representation and Pay Equity Commitments” (NIKE_00003198-99), produced by Nike in this litigation, and entered as deposition exhibit 633 at the deposition of Monique Matheson, February 22, 2021.

Based on the metadata associated with this document, produced by Nike, this document was last modified on July 1, 2019.

15. Attached hereto as Exhibit 14 is a true and correct copy of “Manager Playbook, Hiring” (NIKE_00003251), produced by Nike in this litigation, and entered as deposition exhibit 662 at the deposition of Shine Thomas, March 26, 2021. Based on the metadata associated with this document, produced by Nike, this document was last modified on July 31, 2019.

16. Attached hereto as Exhibit 15 is a true and correct copy of “Non-Competitive Job Change, Manager Education Tool” (NIKE_00003255), produced by Nike in this litigation, and entered as deposition exhibit 636 at the deposition of Treasure Heinle, March 16, 2021. Based on the metadata associated with this document, produced by Nike, this document was created on August 16, 2006 and last modified on July 31, 2019.

17. Attached hereto as Exhibit 16 is a true and correct copy “Annual Pay Review, Key Terms” (NIKE_00003273-78), produced by Nike in this litigation, and entered as deposition exhibit 543 at the deposition of Shane Walker, December 21, 2020. Based on the metadata associated with this document, produced by Nike, this document was created and last modified on June 14, 2019.

18. Attached hereto as Exhibit 17 is a true and correct copy of “Annual Pay Review, Manager Toolkit,” dated April 2019 (NIKE_00003279-86), produced by Nike in this litigation, and entered as deposition exhibit 530 at the deposition of Shane Walker, December 18, 2020. Based on the metadata associated with this document, produced by Nike, this document was created on and last modified on May 31, 2019.

19. Attached hereto as Exhibit 18 is a true and correct copy of “Annual Pay Review, Pay Executive Review Job Aid” (NIKE_00003287-91), produced by Nike in this litigation, and

entered as deposition exhibit 610 at the deposition of Shelli White, January 29, 2021. Based on the metadata associated with this document, produced by Nike, this document was created on and last modified on May 31, 2019.

20. Attached hereto as Exhibit 19 is a true and correct copy of a Taleo printout of a job application by Tracee Cheng for job 00114498 (NIKE_00007038-105), produced by Nike in this litigation, and entered as deposition exhibit 675 at the deposition of Shine Thomas, March 26, 2021. Based on the metadata associated with this document, produced by Nike, this document was created and last modified on August 29, 2018.

21. Attached hereto as Exhibit 20 is a true and correct copy of “Hiring Process Updates, FAQs” (NIKE_00013856-60), produced by Nike in this litigation, and entered as deposition exhibit 660 at the deposition of Shine Thomas, March 26, 2021. Based on the metadata associated with this document, produced by Nike, this document was created and last modified on December 13, 2018.

22. Attached hereto as Exhibit 21 is a true and correct copy of “Hiring at Nike, HRBP Activation Kit” dated November 2018 (NIKE_00013861-70), produced by Nike in this litigation. Based on the metadata associated with this document, produced by Nike, this document was created and last modified on December 6, 2018.

23. Attached hereto as Exhibit 22 is a true and correct copy of “FY17 PSP Brochure” (NIKE_00019411-12), produced by Nike in this litigation, and entered as deposition exhibit 598 at the deposition of Shelli White, January 29, 2021. Based on the metadata associated with this document, produced by Nike, this document was created and last modified on November 17, 2016.

24. Attached hereto as Exhibit 23 is a true and correct copy of an email from KeJuan Wilkins regarding “NYT answers,” sent April 20, 2018 (NIKE_00019526-33), produced by Nike in this litigation, and entered as deposition exhibit 583 at the deposition of Alison Daugherty, January 8, 2021. Based on the metadata associated with this document, produced by Nike, this document was created and last modified on April 20, 2018.

25. Attached hereto as Exhibit 24 is a true and correct copy of a document titled “NYT follow up responses” (based on metadata associated with the document produced by Nike), numbered NIKE_00019546-47, produced by Nike in this litigation. Based on the metadata associated with this document, produced by Nike, this document was created and last modified on April 21, 2018.

26. Attached hereto as Exhibit 25 is a true and correct copy of a Matter of Respect complaint against [REDACTED] (NIKE_00023392-407), produced by Nike in this litigation. Based on the metadata associated with this document, produced by Nike, this document is titled “<External>8 FWD: [REDACTED] - Matter of Respect,” and was created and last modified on September 10, 2019.

27. Attached hereto as Exhibit 26 is a true and correct copy of “Internal Movement” (NIKE_00023547), produced by Nike in this litigation, and entered as deposition exhibit 549 at the deposition of Shane Walker, December 17, 2020. Based on the metadata associated with this document, produced by Nike, this document was created on January 8, 2013 and last modified on August 2, 2016.

28. Attached hereto as Exhibit 27 is a true and correct copy of “Nike Job Architecture” (NIKE_00023548), produced by Nike in this litigation, and entered as deposition exhibit 507 at the deposition of Shane Walker, December 17, 2020. Based on the metadata

associated with this document, produced by Nike, this document was created on January 8, 2013 and last modified on August 10, 2016.

29. Attached hereto as Exhibit 28 is a true and correct copy of “Nike’s Pay Ranges VALUES Bands” (NIKE_00023550), produced by Nike in this litigation, and entered as deposition exhibit 516 at the deposition of Shane Walker, December 17, 2020. Based on the metadata associated with this document, produced by Nike, this document was created on January 8, 2013 and last modified on July 31, 2016.

30. Attached hereto as Exhibit 29 is a true and correct copy of “Range Positioning” (NIKE_00023551), produced by Nike in this litigation, and entered as deposition exhibit 518 at the deposition of Shane Walker, December 17, 2020. Based on the metadata associated with this document, produced by Nike, this document was created on January 8, 2013 and last modified on July 31, 2016.

31. Attached hereto as Exhibit 30 is a true and correct copy of an email from HR Communications regarding “HRBP Update: September 14, 2017,” sent September 14, 2017 (NIKE_00023658-59), produced by Nike in this litigation, and entered as deposition exhibit 514 at the deposition of Shane Walker, December 17, 2020. Based on the metadata associated with this document, produced by Nike, this document was created and last modified on September 14, 2017.

32. Attached hereto as Exhibit 31 is a true and correct copy of “Competitive Hiring Checklist” (NIKE_00024155-57), produced by Nike in this litigation, and entered as deposition exhibit 669 at the deposition of Shine Thomas, March 26, 2021. Based on the metadata associated with this document, produced by Nike, this document was created and last modified on July 30, 2020.

33. Attached hereto as Exhibit 32 is a true and correct copy of “FY20 Total Rewards Update,” dated May 24, 2019 (NIKE_00024195), produced by Nike in this litigation, and entered as deposition exhibit 515 at the deposition of Shane Walker, December 17, 2020.

34. Attached hereto as Exhibit 33 is a true and correct copy of “FAQs for TA-Compensation Programs Changes” (NIKE_00024196-98), produced by Nike in this litigation, and entered as deposition exhibit 670 at the deposition of Shine Thomas, March 26, 2021. Based on the metadata associated with this document, produced by Nike, this document was last modified on June 6, 2019.

35. Attached hereto as Exhibit 34 is a true and correct copy of “Salary Survey Process Playbook” (NIKE_00024565-77), produced by Nike in this litigation. Based on the metadata associated with this document, produced by Nike, this document was last modified on August 15, 2017.

36. Attached hereto as Exhibit 35 is a true and correct copy of “Annual Pay Review Deep Dive - Total Rewards,” dated March 12, 2019 (NIKE_00024770), produced by Nike in this litigation, and entered as deposition exhibit 522 at the deposition of Shane Walker, December 17, 2020. Based on the metadata associated with this document, produced by Nike, this document was created on November 14, 2018 and last modified on March 13, 2019.

37. Attached hereto as Exhibit 36 is a true and correct copy of “Annual Pay Review: HR Deep Dive,” dated May 7, 2019 (NIKE_00026514), produced by Nike in this litigation, and entered as deposition exhibit 596 at the deposition of Shelli White, January 29, 2021. Based on the metadata associated with this document, produced by Nike, this document was created on April 5, 2019 and last modified on May 20, 2019.

38. Attached hereto as Exhibit 37 is a true and correct copy of “Performance Rewards: CFE Collection FAQs for Managers” (NIKE_00026617-20), produced by Nike in this litigation, and entered as deposition exhibit 603 at the deposition of Shelli White, January 29, 2021. Based on the metadata associated with this document, produced by Nike, this document was created and last modified on April 25, 2016.

39. Attached hereto as Exhibit 38 is a true and correct copy of “Manager Playbook, Planning Talent,” (NIKE_00026686), produced by Nike in this litigation, and entered as deposition exhibit 701 at the deposition of Elizabeth Vales, May 27, 2021. Plaintiffs attempted to make this document text searchable, but were unable to do so due to the poor image quality of the original document.

40. Attached hereto as Exhibit 39 is a true and correct copy of “Nike Talent Planning, Strategic Framework,” dated May 2014 (NIKE_00027184), produced by Nike in this litigation, and entered as deposition exhibit 647 at the deposition of Treasure Heinle, March 16, 2021. Based on the metadata associated with this document, produced by Nike, this document was created on October 25, 2013 and last modified on June 5, 2014.

41. Attached hereto as Exhibit 40 is a true and correct copy of “Team & Talent On the Offense – Talent Management – Preparing for Org Transformations,” dated April 2016 (NIKE_00027185), produced by Nike in this litigation, and entered as deposition exhibit 707 at the deposition of Elizabeth Vales, May 27, 2021. Based on the metadata associated with this document, produced by Nike, this document was created on April 16, 2014 and last modified on April 12, 2017.

42. Attached hereto as Exhibit 41 is a true and correct copy of an email from Kelly Cahill, regarding “Digital Brand Wholesale Manager position,” sent May 13, 2016 (NIKE_00028010-21), produced by Nike in this litigation.

43. Attached hereto as Exhibit 42 is a true and correct copy of “Inside the Lines, Nike Code of Conduct” (NIKE_00029808-43), produced by Nike in this litigation, and entered as deposition exhibit 659 at the deposition of Shine Thomas, March 26, 2021. Based on the metadata associated with this document, produced by Nike, this document was created on May 3, 2019 and last modified on June 10, 2019.

44. Attached hereto as Exhibit 43 is a true and correct copy of “Performance Rewards, HRBP FAQs” (NIKE_00030245-50), produced by Nike in this litigation, and entered as deposition exhibit 529 at the deposition of Shane Walker, December 18, 2020. Based on the metadata associated with this document, produced by Nike, this document was created and last modified on April 8, 2016.

45. Attached hereto as Exhibit 44 is a true and correct copy of “Managing Base Pay,” dated October 30, 2020 (NIKE_00030684-85), produced by Nike in this litigation, and entered as deposition exhibit 668 at the deposition of Shine Thomas, March 26, 2021. Based on the metadata associated with this document, produced by Nike, this document is titled “Managing Base Pay-Aug 2017,” and was created and last modified on October 30, 2020.

46. Attached hereto as Exhibit 45 is a true and correct copy of “Base Pay: Unpublished,” (NIKE_00030825-26), produced by Nike in this litigation, and entered as deposition exhibit 674 at the deposition of Shine Thomas, March 26, 2021. Based on the metadata associated with this document, produced by Nike, this document was created and last modified on October 30, 2020.

47. Attached hereto as Exhibit 46 is a true and correct copy of "Subject **MORHL: OC: MOR - [REDACTED]" (NIKE_00032843-45), produced by Nike in this litigation, and entered as deposition exhibit 581 at the deposition of Alison Daugherty, January 8, 2021. Based on the metadata associated with this document, produced by Nike, this document was created and last modified on December 18, 2019

48. Attached hereto as Exhibit 47 is a true and correct copy of Survey Complaint (NIKE_00033334-37), produced by Nike in this litigation, and entered as deposition exhibit 570 at the deposition of Alison Daugherty, January 8, 2021. Based on the metadata associated with this document, produced by Nike, this document was created and last modified on March 7, 2018.

49. Attached hereto as Exhibit 48 is a true and correct copy of Survey Complaint ([REDACTED]) (NIKE_00033338-43), produced by Nike in this litigation, and entered as deposition exhibit 587 at the deposition of Alison Daugherty, January 8, 2021. Based on the metadata associated with this document, produced by Nike, this document was created and last modified on March 7, 2018.

50. Attached hereto as Exhibit 49 is a true and correct copy of Survey Complaint (NIKE_00033344-45), produced by Nike in this litigation, and entered as deposition exhibit 623 at the deposition of Alison Daugherty, February 5, 2021. Based on the metadata associated with this document, produced by Nike, this document was created and last modified on March 7, 2018.

51. Attached hereto as Exhibit 50 is a true and correct copy of Survey Complaint ([REDACTED]) (NIKE_00033352-55), produced by Nike in this litigation, and entered as deposition exhibit 622 at the deposition of Alison Daugherty, February 5, 2021. Based on the

metadata associated with this document, produced by Nike, this document was created and last modified on March 7, 2018.

52. Attached hereto as Exhibit 51 is a true and correct copy of Survey Complaint (NIKE_00033364-65), produced by Nike in this litigation, and entered as deposition exhibit 620 at the deposition of Alison Daugherty, February 5, 2021. Based on the metadata associated with this document, produced by Nike, this document was created and last modified on March 7, 2018.

53. Attached hereto as Exhibit 52 is a true and correct copy of Survey Complaint (NIKE_00033366-67), produced by Nike in this litigation, and entered as deposition exhibit 621 at the deposition of Alison Daugherty, February 5, 2021. Based on the metadata associated with this document, produced by Nike, this document was created and last modified on March 7, 2018.

54. Attached hereto as Exhibit 53 is a true and correct copy of “Job Descriptions” (NIKE_00034219), produced by Nike in this litigation, and entered as deposition exhibit 680 at the deposition of Jessica Stuckey, May 14, 2021. Based on the metadata associated with this document, produced by Nike, this document was created and last modified on May 13, 2021.

55. Attached hereto as Exhibit 54 is a true and correct copy of an organizational chart of “Global Apparel Offense” (NIKE_00044516), produced by Nike in this litigation. Based on the metadata associated with this document, produced by Nike, this document was created and last modified on June 19, 2017.

56. Attached hereto as Exhibit 55 is a true and correct copy of Nike Inc. Organizational Chart (NIKE_00046625-26), produced by Nike in this litigation. Based on the metadata associated with this document, produced by Nike, this document is titled

“NikeInc_Business_ORG_Chart_OptFINAL,” and was created and last modified on September 25, 2015.

57. Attached hereto as Exhibit 56 is a true and correct copy of Nike, Inc. “Schedule 14A Information,” Definitive Proxy Statement, submitted to the Securities and Exchange Commission, July 24, 2018 (PLF_000010-63), produced by Plaintiffs in this litigation, and entered as deposition exhibit 626 at the deposition of Alison Daugherty, February 5, 2021.

58. Attached hereto as Exhibit 57 is a true and correct copy of “At Nike, Revolt Led by Women Leads to Exodus of Male Employees,” dated April 28, 2018 (PLF_000417-41), produced by Plaintiffs in this litigation, and entered as deposition exhibit 582 at the deposition of Alison Daugherty, January 8, 2021.

59. Attached hereto as Exhibit 58 is a true and correct copy of “Talk with me, Band and Levels,” dated June 3, 2013 (PLF_001989-1990), produced by Plaintiffs in this litigation, and entered as deposition exhibit 682 at the deposition of Jessica Stuckey, May 14, 2021.

60. Attached hereto as Exhibit 59 is a true and correct copy of email from Monique Matheson regarding “Update and Announcement,” sent April 13, 2018 (PLF_026394-96) produced by Plaintiffs in this litigation.

61. Attached hereto as Exhibit 60 is a true and correct copy of an email from Felicia Davis regarding “Cahill v. Nike – Shane Walker and Alison Daugherty Depositions,” dated December 8, 2020, and entered as deposition exhibit 502 at the deposition of Shane Walker, December 17, 2020.

62. Attached hereto as Exhibit 61 is a true and correct copy of “Nike, Inc. Announces Monique Matheson As New EVP, Global Human Resources,” Nike News, dated July 18, 2017,

which entered as deposition exhibit 631 at the deposition of Monique Matheson, February 22, 2021.

63. Attached hereto as Exhibit 62 are true and correct excerpts from the deposition of Lauren Anderson, taken on January 21, 2021 and February 5, 2021.

64. Attached hereto as Exhibit 63 are true and correct excerpts from the deposition of Paige Azavedo, taken on January 29, 2021.

65. Attached hereto as Exhibit 64 are true and correct excerpts from the deposition of Christina Baumel, taken on January 26, 2021.

66. Attached hereto as Exhibit 65 are true and correct excerpts from the deposition of Kelly Cahill, taken on November 18, 2020.

67. Attached hereto as Exhibit 66 are true and correct excerpts from the deposition of Tracee Cheng, taken on December 2, 2020.

68. Attached hereto as Exhibit 67 are true and correct excerpts from the deposition of Alison Daugherty (Nike Rule 30(b)(6) witness), taken on January 8 and February 5, 2021.

69. Attached hereto as Exhibit 68 are true and correct excerpts from the deposition of Lindsay Elizabeth, taken on January 11, 2021.

70. Attached hereto as Exhibit 69 are true and correct excerpts from the deposition of Dr. Chester Hanvey, taken on October 29, 2021.

71. Attached hereto as Exhibit 70 are true and correct excerpts from the deposition of Treasure Heinle (Nike Rule 30(b)(6) witness), taken on March 16, 2021.

72. Attached hereto as Exhibit 71 are true and correct excerpts from the deposition of Heather Hender, taken on January 14 and March 17, 2021.

73. Attached hereto as Exhibit 72 are true and correct excerpts from the deposition of Sara Johnston, taken on November 24, 2020.

74. Attached hereto as Exhibit 73 are true and correct excerpts from the deposition of Jessica Junkins, taken on December 16, 2020.

75. Attached hereto as Exhibit 74 are true and correct excerpts from the deposition of Monique Matheson, taken on February 22, 2021.

76. Attached hereto as Exhibit 75 are true and correct excerpts from the deposition of Julian Miller (Nike Rule 30(b)(6) witness), taken on June 3, 2021.

77. Attached hereto as Exhibit 76 are true and correct excerpts from the deposition of Samantha Phillips, taken on December 1, 2020.

78. Attached hereto as Exhibit 77 are true and correct excerpts from the deposition of Dr. Ali Saad, taken on October 27, 2021.

79. Attached hereto as Exhibit 78 are true and correct excerpts from the deposition of Jessica Stuckey (Nike Rule 30(b)(6) witness), taken on May 14, 2021.

80. Attached hereto as Exhibit 79 are true and correct excerpts from the deposition of Shine Thomas (Nike Rule 30(b)(6) witness), taken on March 26, 2021.

81. Attached hereto as Exhibit 80 are true and correct excerpts from the deposition of Emily Tucker, taken on January 22, 2021.

82. Attached hereto as Exhibit 81 are true and correct excerpts from the deposition of Shane Walker (Nike Rule 30(b)(6) witness), taken on December 17, 18 and 21, 2020.

83. Attached hereto as Exhibit 82 are true and correct excerpts from the deposition of Jessica Westerhof, taken on April 21, 2021.

84. Attached hereto as Exhibit 83 are true and correct excerpts from the deposition of Shelli White (Nike Rule 30(b)(6) witness), taken on January 29, 2021.

I declare under penalty of perjury under the laws of the State of California and of the United States that the foregoing is true and correct, and that this Declaration was executed this 10th day of January, 2022 in Berkeley, California.

/s/ Mengfei Sun
Mengfei Sun